

Joyce W. Lindauer
State Bar No. 21555700
Guy H. Holman
State Bar No. 24095171
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, TX 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,

Plaintiff,

v.

**A-Z WHOLESALERS INC. and
BARKAT G. ALI,**

Defendants.

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CIVIL ACTION NO. 3:19-CV-1057-B

DEFENDANT’S MOTION TO QUASH DEPOSITION

COMES NOW, Defendant, Barkat G. Ali, by and through counsel, hereby file his *Motion to Quash Deposition* (the “*Motion*”), and in support of same would show the Court as follows:

1. Defendant was served with a notice to oral deposition scheduled for December 16, 2020 at 9:30 a.m. [**Exhibit A**].
2. Defendant is currently recovering from colon surgery and requires the deposition to be rescheduled.
3. Defendant will work in earnest with Plaintiff’s counsel to reset the deposition for a more convenient time for the parties.
4. This Motion is filed in good faith and not with the intent to hinder or delay.

WHEREFORE, PREMISES CONSIDERED, Defendant prays the Court quashes the Notice of Deposition to allow the parties to work cooperatively to reset the deposition date to a time more convenient to the parties.

DATED: December 15, 2020

Respectfully submitted,

/s/ Joyce W. Lindauer
Joyce W. Lindauer
State Bar No. 21555700
Guy Harvey Holman
State Bar No. 24095171
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
joyce@joycelindauer.com
guy@joycelindauer.com
ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that on December 15, 2020, my associate, Guy Holman, attempted to confer with counsel for Plaintiff, but due to the emergency nature of the Motion, was unable to confirm whether counsel was opposed to the Motion prior to its filing.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 15, 2020, a true and correct copy of the foregoing was served on all parties via the Court's ECF system.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 3:19-CV-1057-B
	§	
A-Z WHOLESALERS INC. and	§	
BARKAT G. ALI,	§	
	§	
Defendants.	§	

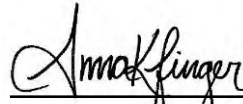
NOTICE OF DEPOSITION OF BARKAT G. ALI

To: Defendants A-Z Wholesalers, Inc. and Barkat G. Ali, by and through their counsel, Joyce W. Lindauer, Jeffrey M. Veteto, and Guy Harvey Holman, Joyce W. Lindauer Attorney, PLLC, 12720 Hillcrest Road, Suite 625, Dallas, Texas 75230.

PLEASE TAKE NOTICE that, in accordance with Federal Rule of Civil Procedure 26 and 30, Plaintiff Harrison Company, LLC intends to take the oral deposition of Defendant Barkat G. Ali via videoconference beginning on December 16, 2020, at 9:30 a.m., or some other date and time mutually agreed upon between the parties, and continuing each subsequent day as necessary. Pursuant to Federal Rule of Civil Procedure 30(b)(3), the deposition may be recorded stenographically and by videotaping. The deposition will be taken before an officer authorized to administer oaths and shall be used as evidence in the above-styled action.

EXHIBIT "A"

Respectfully submitted,



David L. Swanson

State Bar No. 19554525

dswanson@lockelord.com

Joseph A. Unis, Jr.

State Bar No. 24075625

junis@lockelord.com

Anna K. Finger

State Bar No. 24105860

anna.k.finger@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2800

Dallas, Texas 75201-6776

T: 214-740-8000

F: 214-740-8800

**ATTORNEYS FOR PLAINTIFF
HARRISON COMPANY, L.L.C.**

CERTIFICATE OF SERVICE

I certify that on November 25, 2020, I served this document on all counsel of record via the ECF system and/or email.

